

ATTACHMENT 2
SUMMARY OF DEADLINES CONTAINED IN CAFO AND INTERIM MEASURES PLAN

Requirement	CAFO or PCB Interim Measures Plan (IMP) Provision	Responsible Party	Deadline
Penalty payment	CAFO paragraph 32-35	Respondent	Only upon EPA issuance of Non-remittance Order (in which there will be payment instructions)
Record retention	CAFO paragraph 41	Respondent	For seven years after CAFO obligations are met
Stipulated penalty payment	CAFO paragraph 44	Respondent	Within 30 days of demand unless a greater period of time is specified
Submit CAFO modification proposal if there are changes to regulatory status of PCB-contaminated window glazing compound	CAFO paragraph 57	Respondent	Within 60 days of effective date of regulatory changes
Modify CAFO if there are changes to regulatory status of PCB-contaminated window glazing compound	CAFO paragraph 57	EPA and Respondent	Unspecified time frame. Timing will depend on scope of changes.
Submit work plan to conduct initial indoor air sampling for EPA approval prior to sample collection	IMP Section 5.2.4	Respondent	Within 60 days of the effective date of CAFO
Window cleaning, containment, verification, and baseline sampling	IMP Sections 4.1, 4.2, 4.3, 4.4, and 6.1	Respondent	Within 24 months of effective date of CAFO

Requirement	CAFO or PCB Interim Measures Plan (IMP) Provision	Responsible Party	Deadline
Submit report re. window cleaning, containment (encapsulation), verification and baseline sampling, including proposal for air monitoring frequency	IMP Section 4.5	Respondent	Within 90 days of completion of window cleaning, containment, verification, and baseline sampling
Record Deed Notice	IMP Section 4.6	Respondent	Record within 60 days of completing window cleaning, containment, verification, and baseline sampling
Complete annual long-term monitoring activities	IMP Section 5.2	Respondent	By June 30 of each year after encapsulation occurs
Complete training for new employees and annual awareness email update and posting about status of windows	IMP Section 5.5, 5.6	Respondent	Employee training offered by the end of every month for new employees, with the first being offered within 30 days of the effective date of the CAFO. Annual awareness email and posting by September 30 of each year after encapsulation occurs.
Submit notice to EPA if sampling indicates exceedences of project-specific action levels, and propose corrective measures, if required, in any of the exceedence areas.	IMP Section 5-3	Respondent	Within 30 days of receiving analytical data
Complete corrective measures if annual long-term monitoring activities reveal exceedence of cleanup levels	IMP Section 5.3	Respondent	Within 30 days of approval of proposed measures or some other agreed-upon interval depending on the required measures and procurement procedures that must be followed
Submit annual report to EPA and post report on UMASS web site	IMP Section 5.3 and 5.6	Respondent	By September 30 of each year
Submit notice to EPA prior to commencing any window removal and replacement project	IMP Section 6.2 CAFO paragraph 28	Respondent	At least 30 days before commencing any window removal or replacement project

Requirement	CAFO or PCB Interim Measures Plan (IMP) Provision	Responsible Party	Deadline
Removal and replacement of certain windows on Floors 3, 7, 8 of LGRC A	IMP Section 6 CAFO paragraph 21(i)	Respondent	By December 31, 2012
All Facility windows removed and replaced and all PCB Bulk Product waste properly disposed of	IMP Section 6 CAFO paragraph 21(i)	Respondent	Within 15 years of effective date of CAFO unless CAFO has been modified

In Re: The University of Massachusetts System

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Administrative Consent Agreement and Final Order has been sent to the following persons on the date noted below:

Original and one copy,
hand-delivered:

Wanda Santiago
Regional Hearing Clerk
U.S. EPA, Region I
5 Post Office Square
Suite 100 (ORA18-1)
Boston, MA 02109-3912

Three copies of Consent Agreement
via certified mail,
return receipt requested

Brian W. Burke
Associate Counsel
University of Massachusetts Amherst
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Dated: June 21, 2012



Catherine S. Smith
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